

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

DONIEL CARTER,

Plaintiff,

v.

Case No. 18-CV-0727

ERIKA WATSON, et al.

Defendants.

**DEFENDANT TARA WEIDEMAN'S PROPOSED
SPECIAL VERDICT FORM**

Defendant Weideman submits the attached proposed special verdict form for
use at trial in this matter.

Dated this 12th day of October, 2021.

Respectfully submitted,

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Question 1: Did Defendant Watson engage in a sexual act with Plaintiff Carter while he was a prisoner and she was a correctional officer at Fox Lake Correctional Institution

_____ (Yes or No)

**If you answered “Yes” to Question 1, then answer Question 2.
If you answered “No” to Question 1, then STOP and do not answer any more questions.**

Question 2: Was the sexual act that Defendant Watson engaged in with Plaintiff Carter coercive and non-consensual?

_____ (Yes or No)

**If you answered “Yes” to Question 2, then answer Question 3.
If you answered “No” to Question 2, then STOP and do not answer any more questions.**

Question 3: Did Defendant Watson engage in the coercive and non-consensual sexual act with Plaintiff Carter for the purpose of harming Plaintiff Carter?

_____ (Yes or No)

**If you answered “Yes” to Question 3, then answer Question 4.
If you answered “No” to Question 3, then STOP and do not answer any more questions.**

Question 4: Did Defendant Watson’s conduct harm Plaintiff Carter?

_____ (Yes or No)

**If you answered “Yes” to Question 4, then answer Questions 5-7.
If you answered “No” to Question 4, then STOP and do not answer any more questions.**

Question 5: What sum of money, if any, would fairly and reasonably compensate Plaintiff Carter for the harm caused to him by Defendant Watson?

_____ (Amount in Dollars)

Question 6: What amount of punitive damages, if any, do you find are appropriate for the actions by Defendant Watson?

_____ (Amount in Dollars)

Question 7: Did Defendant Weideman fail to protect Plaintiff Carter from harm by Defendant Watson?

_____ (Yes or No)

**If you answered “Yes” to Question 7, then answer Questions 8-9.
If you answered “No” to Question 7, then STOP and do not answer any more questions.**

Question 8: What sum of money, if any, would fairly and reasonably compensate Plaintiff Carter for Defendant Weideman’s actions or inactions?

_____ (Amount in Dollars)

Question 9: What amount of punitive damages, if any, do you find are appropriate for the actions or inactions by Defendant Weideman?

_____ (Amount in Dollars)